

Attorneys for United States

**JOINT MOTION TO VACATE AND
RESET PRETRIAL ORDER
DEADLINE**

U.S. DEPARTMENT OF JUSTICE
Tax Division, Western Region
P.O. Box 683
Washington, D.C. 20044
Telephone: 202-353-0300

1 1. On January 13, 2020, the Defendant submitted a settlement offer to the United
2 States. Due to the amount at issue in this case, that settlement offer must be reviewed by senior
3 Department of Justice and IRS officials.

4 2. On May 31, 2020, while Defendant's settlement offer was still under
5 consideration by the Department, this Court ordered the parties to submit a proposed pretrial
6 order by June 30, 2020. Dkt. # 52.

7 3. On June 12, 2020, after further settlement discussions between the parties, the
8 Defendant submitted a revised formal settlement offer to the United States. Again, that
9 settlement offer must be reviewed by senior Department of Justice and IRS officials prior to
10 being accepted by the Department. That review has been ongoing.

11 4. Recently, the IRS requested that the Defendant submit additional supporting
12 documents in connection with the settlement offer. Defendant is in the process of attempting to
13 obtain that material.

14 5. Given the above, the parties request that the Court grant this motion to vacate and
15 reset the pretrial order. Granting this motion would permit the parties to attempt to resolve this
16 case without further litigation expense, thereby conserving the resources of the parties and the
17 Court.

18 6. Granting the motion will not impact any other deadline in this case. Therefore,
19 this requested extension will not prejudice the timely, orderly, efficient resolution of this case.

20 WHEREFORE, the parties hereby move the Court to vacate the deadline to submit a
21 proposed pretrial order and reset it to a date no sooner than 60 days from the date of such action.

1 Dated: August 28, 2020.

2 Respectfully submitted,

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Principal Deputy Assistant Attorney General

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7 U.S. Department of Justice

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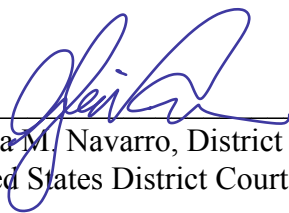
*Attorneys for Estate of
Sandra J. de Forrest*

ORDER

19 **IT IS HEREBY ORDERED** that the above Joint Motion to Vacate and Reset Pretrial
20 Order Deadline, (ECF No. 55), is **GRANTED**. The parties shall submit a proposed joint pretrial
21 order by November 2, 2020.

22 **DATED** this 8 day of September, 2020.

23 **NUNC PRO TUNC:** August 31, 2020.

24 
Gloria M. Navarro, District Judge
United States District Court